United States Department of Agriculture
Food Safety And Inspection Service
Technical Service Center
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AUDIT REPORT FOR AUSTRALIA
AUGUST 2 THROUGH SEPTEMBER 5, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Australia's meat inspection system from August 2 through September 5, 2001. Eleven of the 103 establishments certified to export meat to the United States were audited. Ten of these were slaughter establishments and the other one was conducting processing operations.

In addition, three newly proposed certified ratite establishments were audited. All three establishments were conducting slaughtering operations.

The last audit of the Australian meat inspection system was conducted in October 2000. Nine establishments were audited: eight were acceptable (Ests. 688, 517, 2309, 640, 572, 297, 195, and 3085), and one (533) was evaluated as unacceptable. The major concerns from that audit were:

- Zero tolerance defects were observed in the sheep dressing procedures due to urine spillage in four establishments (Ests. 572, 640, 2309, and 533).
- Condensation was observed above exposed product and/or above exposed product trafficways in two establishments (Ests. 688, 3085).
- Rodent baits were located in production areas in establishment 517.

The deficiencies addressed in Establishment 533, which was evaluated as unacceptable during the last audit, were found to be corrected during this audit.

At the time of this audit, Australia was eligible to export fresh, processed beef, lamb, mutton, and goat products to the United States.

During the first seven months of Calendar Year 2001, 90 Australian establishments exported about 569 million pounds of beef, mutton, lamb and goat to the United States. Port-of-entry (POE) rejections were 0.264 percent of the total import for all defects.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Australian national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat

inspection headquarters facilities and at other sites. The third was conducted by on-site visits to establishments. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella and Escherichia coli.*

Establishments for this on-site audit were selected from a group of 28 drawn from the total list of 103 establishments certified by Australia to export to the United States. From the group of 28 establishments, 10 were randomly selected for on-site visits and the remaining 18 were chosen for a centralized records review. Added to the 10 establishments for on-site visits were three ratite establishments and one other establishment, which was evaluated unacceptable during the previous audit. Accordingly, the total number of establishments selected for on-site visits was 14.

Australia's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the generic *Escherichia coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials (this was the case with one establishment—see below).

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in 12 of the 14 establishments audited on-site; two establishments (224 and 716) were recommended for re-review. Establishment 520, which was not part of the on-site visits, was delisted during the records review because of non-existence of SSOP and HACCP programs. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli,* are discussed later in this report.

As stated previously, the last audit of the Australian meat inspection system was conducted in October 2000. Nine establishments were audited: eight were acceptable (Ests. 195, 640, 688, 3085, 517, 297, 2309, and 572.), and one (533) was unacceptable. The concerns from that audit were in the risk area of Cross-Contamination in Establishments 533, 517, 297 and

572. No effective procedure for detection and removal of urine spillage on sheep carcasses (Ests.533, 572, 2309, and 3085); condensation was observed above exposed product and/or above exposed product trafficways (Ests. 688 and 3085); plastic strip doors were in use in exposed product areas in most establishments. During this new audit, the auditor determined that all deficiencies, with the exception of urine contamination, were found to be addressed and corrected.

HACCP-implementation deficiencies had been found in one of the nine establishments visited (Est. 297) during the last audit. In this establishment's HACCP plan, the temperature of the incoming carcasses was not addressed.

During this new audit, implementation of the required HACCP programs was found to be deficient in several criteria in two establishments (224 and 716); and a few criteria in six of the 14 establishments visited (08, 359, 648, 2346, 3416 and 3458). During the records review of Establishment 520, no HACCP program was found. Details are provided in the Slaughter and Processing Control Section later in this report.

Entrance Meeting

On August 2, 2001, an entrance meeting was held in the Canberra offices of the Australian Quarantine and Inspection Service (AQIS), and was presided by Dr. Albert Cobb, Area Technical Manager Co-ordinator, AQIS and attended by Ms. Meryl Stanton, Excutive Director, AQIS; Mr. Greg Read, Executive Manager, Exports, AQIS, Ms. Ann McDonald, General Manager, Market Maintenance, AQIS, Dr. Peter Miller, Program Manager Meat, Food Services; Dr. Jonathan Webber, Manager National Residue Program; Mr. Neville Spencer, Manager, Meat Technical Support Team, Food Services; Dr. John Langbridge, Senior Area Technical Manager; Dr. Peter McGregor, Senior Area Technical Manager (Victoria); Dr. Steven Tidswell, Area Technical Manager (Canberra); Dr. Jack Haslam, Market Maintenance; Bill Mathews, Market Maintenabce, AQIS; Melanie O'Flynn, Manager, National Residue Survey (NRS); Dr. Jonathon Webber, NRS; Mr. Max Darvill, National Registration Authority; Dr. Suresh (Sam) P. Singh, International Audit Staff Officer; Dr. Ghias Mughal, Chief, International Audit, Review Program, Technical Services Center, FSIS, USDA; and Dr. Randolph H. Zeitner, Agricultural Counselor, USDA, U.S. Embassy, Canberra, Australia.

Topics of presentation and discussion included the following:

1. Welcome by Meryl Stanton, Excutive Director, AQIS.

2. AQIS structural Changes affecting meat by Greg Read.

3. Animal Health in Australia by Andrew Cupit.

4. National Residue Survey by Jonathon Webber.

5. The equivalence of HACCP and the Meat Hygiene Assessment (MHA) and Meat Safety Quality Assurance (MSQA) scheme by Peter Miller and Albert Cobb.
6. Systems Audits, National Plant Management System (NPMS), E.coli and Salmonella Monitoring Program (ESAM) and Scheme for Corrective Action (SCA) by Peter Miller, Albert Cobb and John Langbridge.

7. Information on rejected imports at U.S. Import Stations.

8. Australian response since the last FSIS Audit.

Headquarters Audit

There have been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Australia's inspection system in October 2000.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters of the inspection service, at a district or regional office or other convenient site. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPS, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The following concerns arose as a result the examination of documents of SSOP and HACCP programs, which are mentioned in Attachment A and B of this report.

1. In two establishments (297 and 1618) records of the monitoring of daily operational sanitation records were not maintained.
2. In establishment 260, the HACCP plan did not include the intended use of the finished products.
3. In Establishments 039, 847, 887, 1618, and 3085, the HACCP plans did not specify the monitoring frequency performed for each Critical Control Point (CCP).
4. In Establishments 260, 291, and 297, the HACCP plans did describe corrective actions but were not specific to a critical limit.
5. In Establishments 656 and 847, the HACCP plans did not show any records of pre-shipment reviews.
6. There was no SSOP or HACCP program documents for Establishment 520, because it was operating as a leased facility of establishment 243.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Australia as eligible to export meat products to the United States were full-time AQIS employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

One hundred and three establishments were certified to export meat products to the United States at the time this audit was conducted. Fourteen establishments including three ratite slaughter facilities were visited for on-site audits. In all of the establishments visited, both AQIS inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products except as noted in this report.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories, intra-laboratory quality assurance procedures, including sample handling and methodology.

The Chemical Residue Laboratory, Australian Government Analytical Laboratories (AGAL) in Paymblec (Sydney), was audited on August 13, 2001. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done.

The check sample program did meet FSIS requirements. Check samples for each analyst are on a monthly basis and samples between laboratories are run every three months.

Australia's microbiological testing for *Salmonella and E. coli* was being performed in private laboratories. One of these, the Micro-Tech Laboratory in Blackburn (Melbourne), was audited on August 14, 2001. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the 14 establishments:

Beef and sheep slaughter and boning – two establishments (246, and 533)
Beef slaughter and boning – six establishments (004, 157, 170, 224, 648, and 716)
Goat and sheep processing only – one establishment (3458)
Sheep and goat slaughter and boning – two establishments (008 and 359)
Ratite, sheep and goat slaughter and boning-three establishments (1980, 2346, and 3416)

SANITATION CONTROLS

Based on the on-site audits of establishments, Australia's inspection system had controls in place for basic establishment facilities, condition of facilities, product protection and handling and establishment sanitation program except as noted below.

> In Establishment 533, chlorination room was not protected from rain and was not secure and maintained properly and there was potential for chemical hazard and loss of chlorination for main water supply to the establishment.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with variations in Establishments 004, 170, 224, and 3416 during on-site visits. In these establishments, daily records of monitoring of operational sanitation were not being maintained on regular basis. One general problem seen was that there was no effective system in place for detection and removal of urine spillage on sheep carcasses during the dressing procedure and the records of monitoring were not maintained.

Cross-Contamination

1. A carcass trim operator was observed not sanitizing hands and equipment between carcasses (Est. 224).
2. Condensate was observed above exposed product (Est. 716).
3. Product conveyor belt was not constructed for cleaning underneath (Est. 648).
4. The correct procedure for re-conditioning of dropped carcasses was not being followed (Ests. 224 and 716).
5. No effective procedure for detection and removal of urine spillage on sheep carcasses (Est. 359).
6. Condemned and trimmed inedible product was observed being accumulated on the floor rather than in marked inedible containers in Establishment 004.
7. Plastic tubs for edible product was observed to contain black grease and dirt on the racks of clean tubs in the boning room in Establishment 2346.

Condition of Facilities and Equipment

1. Overhead structures and equipment were observed with dust and debris in Establishments 224 and 716. In addition, in certain areas, floors and walls were broken and these establishments seemed to have no effective maintenance program to prevent rust, paint and cracks.

2. Rusted overhead structure in cooler in establishment No.224 was observed. No direct product contamination was observed.

Product Handling and Storage

Dry storage rooms were not kept clean and cardboard boxes were stored in contact with walls and there was a potential for vermin infestations in Establishments 008, 648 and 2346.

Personnel Hygiene and Practices

Hand washing facilities in a loading area were not functional in Establishment 648 and in the locker room in Establishment 008.

ANIMAL DISEASE CONTROLS

With the exceptions listed below, Australia's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

1. In Establishment 533, several pathological bruises on beef carcasses were not being trimmed after inspection.

2. In Establishment 008, condemned, inedible and edible containers were not identified. Denaturing ink used in pet food area was not sufficient for the purpose.

Inspection authorities (AQIS) do not keep any daily records of condemnation of organs (liver, heart, kidney and lungs, etc.) according to disease conditions of carcasses, although they do keep records of whole carcasses condemned due to different pathological conditions. Most of the Australian establishments do export organs to the United States. In the United States, FSIS inspectors are required to keep daily organ condemnation records in domestic establishments for disease surveillance purposes and for economic loss determination of feed lot operators and farmers.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Australia's National Residue Testing Plan for 2001 was being followed, and was on schedule. The Australian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The Australian inspection system had controls in place to ensure adequate ante-and post-mortem inspection procedures and dispositions, control and disposition of dead, dying, diseased or disabled animals, humane handling and slaughter, processed product controls including ingredients, formulations and packaging materials.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found not to meet FSIS regulatory requirements in several establishments during on-site visits. Two establishments (224 and 716) did not specify intended use of the finished products, all hazards identified were not included in the plan, the plan did not list critical control points for fecal, ingesta, urine and milk contamination of carcasses (zero tolerance), the plan did not mentioned the monitoring frequency performed for each CCP, and the plan did not produce records of procedures to verify the implementation of HACCP. These two establishments were classified as acceptable re-review.

In five establishments (08, 224, 716, 2346, and 3458), HACCP documents did not mention the intended use of the finished product.

Four establishments (08, 359, 648, and 2346) did not mention the monitoring frequency for each CCP.

In Establishments 359, 224, 2346, 716, and 648, the HACCP plan did not describe specific corrective actions when a critical limit is exceeded.

Adequate documentation of verification procedures was lacking in seven establishments (3416, 224, 2346, 716, 008, 648, and 359).

Five establishments (008, 359, 648, 716, and 3416) did not exhibit routine pre-shipment review records.

Testing for Generic *E. coli*

Australia has adopted the FSIS regulatory requirements for *E. coli* testing in bovines but not in sheep and goats. Australia has requested an equivalence determination from FSIS regarding the generic *E. coli* testing requirements for minor species, e.g., sheep and goats. Australia is testing for *E. coli* in ratites using their own developed criteria in exporting and certified establishments because of interim final rule (381.72(b) published in the U.S. Federal Register on May 7, 2001.

All the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

Additionally, establishments had adequate controls in place to prevent meat products intended for Australian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The AQIS inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls, inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

All beef establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Australia has adopted the FSIS regulatory requirements for *Salmonella* testing for bovine but not for sheep and goats. There are no FSIS requirements for testing for *Salmonella* in sheep, goats or ratites.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements in bovine. Australia is testing for *Salmonella* in Ratites using their own criteria.

Species Verification Testing

At the time of this audit, Australia was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

MONTHLY REVIEWS

These reviews were being performed by the Australian equivalent of Circuit Supervisors. They are titled Area Technical Managers (ATM). All were veterinarians with several years of experience.

The internal review program was not applied equally to both export and non-export establishments. Domestic establishments were not mandatoraly reviewed by Senior ATM's every month. Internal review visits were not always announced in advance, and were conducted, at times by individuals and at other times by a team of reviewers, at least once monthly, and sometimes more often if indicated. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central AQIS offices in Canberra, and were routinely maintained on file for a minimum of three years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility and be reinstated, a group is empowered to conduct an in-depth review. This is called a "Cross Review", and the results are reported to Headquarters Managers for evaluation; they formulate a plan for corrective actions and preventive measures.

Enforcement Activities

The following information was obtained through AQIS Compliance & Investigation, Compliance Information System (CIS). AQIS Compliance & Investigation (C&I) seeks to warrant the integrity of AQIS export and quarantine systems by delivering an investigation and monitoring service designed to encourage industry compliance with the legislative requirements for the movement of goods into or out of Australia. The following statistics deal with the meat related issues during the year 2001.

Founded prosecutions for meat related issues—0

Prosecutions pending---2
This is a forgery matter relating to trade description. The product was described in a manner that did not meet the requirements of the importing country. There is no issue over the integrity of the product in terms of food safety.

Letters of warning issued---3
These letters were issued for matters relating to "ineligible product in export chain" issues between AQIS staff and plant management, and minor hygiene matters.

Matters referred to external agencies---10
These matters were for issues dealt with by State Departments/Jurisdictions, e.g. theft-related issues (Police), animal welfare (RSPCA), and matters under the jurisdiction of State Departments of Agriculture.

Investigations conducted and matter resolved through discussions with management---22
These were matters that included such issues as seals being accidentally broken, door security, and animal welfare where Compliance Investigators negotiated directly with plant management.

EXIT MEETING

An exit meeting was conducted in Canberra on September 5, 2001. The participants were: Mr. Greg Reed Executive Manager AQIS; Dr. Peter Miller, Program Manager, Technical Services, Dr. Jack Haslam, Manager Technical Market Access; National Manager, Food Inspection Operation; Dr. Charles Bosgra, Area Technical Manager; Dr. Albert Cobb, Senior Area Technical Manager Coordinator; Dr. Steve Tidswell, Area Technical Manager (Canberra); Dr. Peter McGregor, Senior Area Technical Manager; (Victoria); Dr. Roger Turner, Senior Area Technical Manager (New South Wales); Dr. John Langbridge; Dr. Suresh Singh, International Audit Staff Officer, USDA, FSIS, and Dr. Ghias Mughal, Branch Chief, International Staff, USDA, FSIS.

The following topics were discussed:

1. Findings and observations in each establishment as stated in this report.
2. HACCP related observations and findings as stated in this report.
3. Zero tolerances for feces, ingesta, milk and urine with emphasis on feces and urine. Australian inspection officials will form a managerial group to solve this problem immediately.
4. Dropped carcass procedures were not being conducted as written. Monitoring will be followed to assure correct response.
5. Post-mortem inspection on the heads of small stock (sheep and goats). Their response was that it was submitted to International Policy Staff, FSIS and they were awaiting a response from them.
6. The rate of sampling for generic *E. coli* testing for sheep. They responded that it had been submitted to International Policy Staff, FSIS and they were awaiting a response.

CONCLUSION

The inspection system of Australia was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. The major problem observed was the lack of policy or procedure to address zero tolerance of feces, urine and ingesta on cattle and sheep carcasses during the slaughter process and in the HACCP plans.

Fourteen establishments were audited: 12 were acceptable, two were evaluated as acceptable re-review. The deficiencies encountered during the on-site establishment audits, in those establishments which were found to be acceptable, were adequately addressed to the auditor's satisfaction.

Dr. Suresh P. Singh (signed)Dr. Suresh P. Singh
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for generic *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Forms
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. Sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
004	√	√	√	√	√	√	No	√
008	√	√	√	√	√	√	√	√
157	√	√	√	√	√	√	√	√
170	√	√	√	√	√	√	No	√
224	√	√	√	√	√	√	No	√
246	√	√	√	√	√	√	√	√
359	√	√	√	√	√	√	√	√
533	√	√	√	√	√	√	√	√
648	√	√	√	√	√	√	√	√
716	√	√	√	√	√	√	√	√
1980	√	√	√	√	√	√	√	√
2346	√	√	√	√	√	√	√	√
3416	√	√	√	√	√	√	No	√
3458	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

007	√	√	√	√	√	√	√	√
039	√	√	√	√	√	√	√	√
222	√	√	√	√	√	√	√	√
235	√	√	√	√	√	√	√	√
239	√	√	√	√	√	√	√	√
249	√	√	√	√	√	√	√	√
260	√	√	√	√	√	√	√	√

291	√	√	√	√	√	√	√	√
294	√	√	√	√	√	√	√	√
297	√	√	√	√	√	√	No	√
344	√	√	√	√	√	√	√	√
558	√	√	√	√	√	√	√	√
656	√	√	√	√	√	√	√	√
847	√	√	√	√	√	√	√	√
887	√	√	√	√	√	√	√	√
1618	√	√	√	√	√	√	No	√
3085	√	√	√	√	√	√	√	√
520	No	No	No	No	NO	NO	No	No

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring result.
9. The HACCP plan lists the establishments's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard an-alysis conduct-ed	3. Use & users include d	4. Plan for each hazard	5. CCPs for all hazards	6. Mon-itoring is spec-ified	7. Corr. Actions are describ ed	8. Plan validate d	9. Adequa te verific. procedu res	10.Ade-quate docu-menta-tion	11. Dated and signed	12.Pre-shipmt. doc. review
004	√	√	√	√	√	√	√	√	√	√	√	√
008	√	√	no	√	√	no	√	√	no	√	√	No
157	√	√	√	√	√	√	√	√	√	√	√	√
170	√	√	√	√	√	√	√	√	√	√	√	√
224	√	√	No	√	No	No	√	√	no	√	√	√
246	√	√	√	√	√	√	√	√	√	√	√	√
359	√	√	√	√	√	No	√	√	no	√	√	No
533	√	√	√	√	√	√	√	√	√	√	√	√
648	√	√	√	√	√	No	No	√	no	√	√	No
716	√	√	No	√	No	No	no	√	no	√	√	√
1980	√	√	√	√	√	√	√	√	√	√	√	√
2346	√	√	no	√	√	No	√	√	no	√	√	No
3416	√	√	√	√	√	√	√	√	no	√	√	No
3458	√	√	no	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

007	√	√	√	√	√	√	√	√	√	√	√	√
039	√	√	√	√	√	No	√	√	√	√	√	√
222	√	√	√	√	√	√	√	√	√	√	√	√
235	√	√	√	√	√	√	√	√	√	√	√	√
239	√	√	√	√	√	√	√	√	√	√	√	√
249	√	√	√	√	√	√	√	√	√	√	√	√
260	√	√	No	√	√	√	√	√	√	√	√	√
291	√	√	√	√	√	√	No	√	√	√	√	√
294	√	√	√		√	√	√	√	√	√	√	√
297	√	√	√	√	√	√	No	√	√	√	√	√
344	√	√	√	√	√	√	√	√	√	√	√	√
558	√	√	√	√	√	√	√	√	√	√	√	√
656	√	√	√	√	√	√	√	√	√	√	√	No
847	√	√	√	√	√	No	√	√	√	√	√	No
887	√	√	√	√	√	No		√	√	√	√	√
1618	√	√	√	√	√	No	√	√	√	√	√	√
3085	√	√	√	√	√	No	√	√	√	√	√	√
520	No	No	No	No	No	No	No	No	No	No	No	No

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 297, which was a processed product facility) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
004	√	√	√	√	√	√	√	√	√	√
008	√	√	√	√	√	√	√	√	√	√
157	√	√	√	√	√	√	√	√	√	√
170	√	√	√	√	√	√	√	√	√	√
224	√	√	√	√	√	√	√	√	√	√
246	√	√	√	√	√	√	√	√	√	√
359	√	√	√	√	√	√	√	√	√	√
533	√	√	√	√	√	√	√	√	√	√
648	√	√	√	√	√	√	√	√	√	√
716	√	√	√	√	√	√	√	√	√	√
3458	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

007	√	√	√	√	√	√	√	√	√	√
039	√	√	√	√	√	√	√	√	√	√
222	√	√	√	√	√	√	√	√	√	√
235	√	√	√	√	√	√	√	√	√	√
239	√	√	√	√	√	√	√	√	√	√
249	√	√	√	√	√	√	√	√	√	√
260	√	√	√	√	√	√	√	√	√	√
291	√	√	√	√	√	√	√	√	√	√
294	√	√	√	√	√	√	√	√	√	√
297	√	√	√	√	√	√	√	√	√	√
344	√	√	√	√	√	√	√	√	√	√
558	√	√	√	√	√	√	√	√	√	√
656	√	√	√	√	√	√	√	√	√	√
847	√	√	√	√	√	√	√	√	√	√
887	√	√	√	√	√	√	√	√	√	√
1618	√	√	√	√	√	√	√	√	√	√
3085	√	√	√	√	√	√	√	√	√	√

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment (except est. 297 which was processed product establishment) was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
004	√	√	N/A	√	√	√
008	√	√	N/A	√	√	√
157	√	√	N/A	√	√	√
170	√	√	N/A	√	√	√
224	√	√	N/A	√	√	√
246	√	√	N/A	√	√	√
359	√	√	N/A	√	√	√
533	√	√	N/A	√	√	√
648	√	√	N/A	√	√	√
716	√	√	N/A	√	√	√
3458	√	√	N/A	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

007	√	√	N/A	√	√	√
039	√	√	N/A	√	√	√
222	√	√	N/A	√	√	√
235	√	√	N/A	√	√	√
239	√	√	N/A	√	√	√
249	√	√	N/A	√	√	√
260	√	√	N/A	√	√	√
291	√	√	N/A	√	√	√
294	√	√	N/A	√	√	√
297						
344	√	√	N/A	√	√	√
558	√	√	N/A	√	√	√
656	√	√	N/A	√	√	√
847	√	√	N/A	√	√	√
887	√	√	N/A	√	√	√
1618	√	√	N/A	√	√	√
3085	√	√	N/A	√	√	√
	√	√	N/A	√	√	√